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8  
9 **IN THE UNITED STATES DISTRICT COURT**  
10  
11 **FOR THE DISTRICT OF NEVADA**

12 KAREN BODDEN, ) Case No. 2:14-cv-01968-RFB-NJK  
13 vs. )  
14 JO GENTRY, *et al.*, )  
15 Respondents. )

**UNOPPOSED MOTION FOR  
ENLARGEMENT OF TIME**

16 Respondents, by and through counsel, ADAM PAUL LAXALT, Attorney General of the State of  
17 Nevada, respectfully move this court for an order granting a sixty (60) day enlargement of time, from the  
18 from July 5, 2016, the date this Court ordered respondents to answer or otherwise respond to the amended  
19 petition, ECF No. 10, in which to respond to Karen Bodden's (Bodden) amended petition for a writ of  
20 habeas corpus filed on June 2, 2016.

21 This motion is based upon the provisions of Rule 6(b) of the Federal Rules of Civil Procedure  
22 and the attached Declaration of Counsel, as well as all other papers, documents, records, pleadings and  
23 other materials on file herein.

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1 There have been no prior enlargements of respondents' time to file said response, and this  
2 motion is made in good faith and not for the purposes of delay.

3 RESPECTFULLY SUBMITTED this 22<sup>nd</sup> day of June, 2016.

4 ADAM PAUL LAXALT  
5 Attorney General

6 By: /s/ Matthew S. Johnson  
7 MATTHEW S. JOHNSON  
Deputy Attorney General

8 IT IS SO ORDERED this 12th day of July, 2016.



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10 RICHARD F. BOULWARE, II  
11 United States District Judge  
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**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEVADA**

KAREN BODDEN, )  
vs. )  
Petitioner, )  
Case No. 2:14-cv-01968-RFB-NJK  
JO GENTRY, *et al.*, )  
Respondents. )  
**DECLARATION OF COUNSEL**

I, MATTHEW S. JOHNSON, hereby state that the assertions of this declaration are true:

1. I am an attorney licensed to practice law in the State of Nevada and qualified and admitted to practice before this Court. I am employed as a Deputy Attorney General in the Office of the Nevada Attorney General. Pursuant to this employment, I have been assigned to represent the respondents in *Karen Bodden v. Jo Gentry, et al* Case No. 2:14-cv-01968-RFB-NJK.

2. On June 30, 2015, this Court directed respondents to answer, or otherwise respond to Bodden's 81-page amended petition within 30 days after it was filed; July 5, 2016. ECF No. 10.

3. Respondents requested the complete record for this case on July 15, 2015, but since the filing of Bodden's amended petition on June 2, 2016, it has recently come to my attention that the entire record and all of the pertinent documents necessary to respond to the amended petition were not provided to respondents by the district court clerk's office.

4. In addition, I have not been able to devote sufficient time to preparing a response to the amended petition because of obligations in other cases, including: *Morales v. D.W. Neven, et al*, Case No. 2:15-cv-00185-GMN-CWH (motion to dismiss filed on June 8, 2016); *French v. Wickman*, Case

1 No. 16 EW 00020 1(B) (response filed in the First Judicial District Court of the State of Nevada on  
2 June 16, 2016); *Drake v. McDaniel et. al.*, Case No. 16 EW 00028 1(B) (response filed in the First  
3 Judicial District Court of the State of Nevada on June 16, 2016); *Krehnovi v. Neven, et. al.*, Case No.  
4 2:15-cv-01645-JAD-GWF (answer filed in the United States District Court for the District of Nevada  
5 on June 17, 2016). I am currently preparing an opposition to application for a certificate of  
6 appealability in *Marquez v. Baker et. al.*, CA NO. 16-16634.

7 5. On June 20, 2016, I contacted Assistant Federal Public Defender Melanie Gavisk about  
8 this request. Ms. Gavisk does not oppose the request for an extension of time.

9 6. Accordingly, I am requesting an additional sixty (60) days, from July 5, 2016, the date  
10 this Court ordered respondents to answer or otherwise respond to the amended petition, ECF No. 10, in  
11 which to respond to Karen Bodden's (Bodden) amended petition for a writ of habeas corpus filed on June  
12 2, 2016. This is my first request for an enlargement of time.

13 Pursuant to 28 U.S.C. § 1746, I hereby certify, under penalty of perjury, that the foregoing is  
14 true and correct.

15 Executed this 22nd day of June, 2016.

16 /s/ Matthew S. Johnson  
17 MATTHEW S. JOHNSON  
Deputy Attorney General

**CERTIFICATE OF SERVICE**

I certify that I am an employee of the Office of the Attorney General and that on June 22, 2016, I served a copy of the foregoing **UNOPPOSED MOTION FOR ENLARGEMENT OF TIME**, by the U.S. District Court's electronic filing system, CM/ECF, to:

**Megan Hoffman**  
**Federal Public Defender**  
**411 East Bonneville Ave Suite 250**  
**Las Vegas, Nevada 89101**  
**Megan.hoffman@fd.org**

/s/ Mary Wilson  
An employee of the  
Office of the Attorney General